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CLERK US DISTRICT COURT DISTRICT OF NEVADA	
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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

\* \* \* \* \*

UNITED STATES OF AMERICA,

Plaintiff,

vs.

NICHOLAS PONH SUON,

Defendant.

Case No. **3:14-cr-00066-MMD-WGC**

INDICMENT FOR VIOLATION OF:

TITLE 18, UNITED STATES CODE,  
SECTIONS 2422(b) – Enticement of a Minor  
to Engage in Illegal Sexual Activity (Count  
One)

TITLE 18, UNITED STATES CODE,  
SECTION 2423(b) – Travel to Engage in  
Illicit Sexual Conduct (Count Two)

THE GRAND JURY CHARGES THAT:

**Count One – Enticement of a Minor for Illegal Sexual Activity**

Between on or above January 30, 2014, to on or about August 29, 2014, in the District of Nevada and elsewhere, the defendant, NICHOLAS PONH SUON, did use any facility of interstate and foreign commerce, to knowingly persuade, induce, entice and coerce an individual, R.R., who had not attained the age of 18 years, to engage in any sexual activity for which any person could be charged with an offense. All in violation of Title 18, United States Code, Section 2422(b).

**Count Two – Travel to Engage in Illicit Sexual Conduct**

On or about August 29, 2014, in the District of Nevada and elsewhere, the defendant, NICHOLAS PONH SUON, did travel in interstate commerce from the State of California to the State of Nevada for the purpose of engaging in any illicit sexual conduct, as defined in Title 18,

United States Code, Section 2423(f), with another person. All in violation of Title 18, United States Code, Section 2423(b).

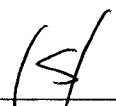
**Forfeiture Provision**

Through the criminal activity described in Count One and Two, which allegations are hereby incorporated herein by reference, the defendant, NICHOLAS PONH SUON, if convicted of Count One and/or Two shall forfeit to the United States any interest in any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of Count One and/or Two; and any property, real or personal, constituting or derived from any proceeds traceable to the commission of Court One and/or Count Two. Such properties include, but are not limited to, the following:

- 1) 2007 Grey Honda Civic Coupe, California License No. 6ZQW105; and,
- 2) One iPhone 5 (Serial No. DQGL560EFH19).

All pursuant to Title 18, United States Code, Section 2428.

A TRUE BILL:

  
\_\_\_\_\_  
FOREPERSON OF THE GRAND JURY

DANIEL G. BOGDEN  
United States Attorney

  
\_\_\_\_\_  
CARLA E. HIGGINBOTHAM  
Assistant United States Attorney